

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

GIFFORD GROUP, INC. d/b/a
JUST PLASTICS f/k/a JUST PLASTICS,
INC.,

Plaintiff,

v.

ARKEMA INC.,

Defendant.


CIVIL ACTION

Docket No. 07-CV-6243 (JGK)

**NOTICE OF MOTION TO DISMISS BY DEFENDANT ARKEMA INC. PURSUANT
TO RULE 12(b)(6) OF THE FEDERAL RULES OF CIVIL PROCEDURE**

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law, and all prior pleadings and proceedings held and had herein, defendant Arkema Inc. ("Arkema") respectfully moves the Court pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure for an Order dismissing with prejudice all claims asserted against Arkema by Plaintiff for failure to state a cause of action upon which relief may be granted. In further support of this Motion, Arkema refers the Court to the attached memorandum of law, the contents of which are incorporated herein by reference.

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Dated: July 12, 2007

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